

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

CASE NO.: 1:CR-01-039

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HARRY SABOWITZ,

Defendant.

/

**MOTION FOR EXTENSION OF TIME OF
PRESENTENCE INVESTIGATION REPORT DISCLOSURE DATE**

COMES NOW the Defendant, HARRY SABOWITZ, by and through his undersigned attorney, and moves this Honorable Court for an Order granting an extension of the Presentence Investigation Report disclosure date, and as grounds for this motion hereby submits the following:

1. That, on July 26, 2007 the Defendant entered a Plea of Guilty to the Indictment.
2. That, subsequently, Your Honor entered an Order requesting that the Presentence Report be disclosed no later than September 19, 2007.
3. That, due to undersigned counsel's trial schedule, a Presentence Investigation Interview is scheduled to take place on August 30, 2007 at 1:00 p.m.
4. That, due to the aforementioned, undersigned counsel respectfully requests a (14) day extension of time of the Presentence Report disclosure date.
5. That, undersigned counsel left a message for Assistant United States Attorney, Christy Fawcett, as to her position on this motion, but as of the time of filing this motion has not received a response.

WHEREFORE the Defendant, HARRY SABOWITZ, respectfully requests that this Honorable Court grant a fourteen (14) day extension of the Presentence Report disclosure date.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished using CM/ECF this 10th day of August, 2007 to Assistant United States Attorney, Christy Fawcett, United States Courthouse, 228 Walnut Street, 2nd Floor, P.O. Box 11754, Harrisburg, PA 17108.

JEFFREY M. VOLUCK, P.A.
Counsel for Defendant
Wachovia Tower-Suite 700
One East Broward Boulevard
Fort Lauderdale, Florida 33301
Telephone: (954) 467-8989
Email: acquit00@bellsouth.net

By: /s/ Jeffrey M. Voluck
JEFFREY M. VOLUCK, ESQUIRE
FLORIDA BAR NO.: 0113750